Buckskin/Shivwits Fuels Reduction and Ecological Restoration
EA-AZ-110-2005-0027

Arizona Strip Field Office
U.S. Bureau of Land Management
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I. INTRODUCTION

The intent of this environment assessment (EA) is to analyze the site specific environmental effects of using chemical methods to reduce Wyoming big sagebrush composition and trees on public rangelands managed by the BLM Arizona Strip Field Office. This EA is tiered to the Vegetation Treatment on BLM Lands in Thirteen Western States Final EIS (FEIS) of May 1991, which assessed how vegetation treatment, including chemical methods, affects elements of the human environment.

Purpose and Need for the Proposed Action. Under the Public Rangelands Improvement Act of 1978 [43 USC sec. 1901 (b) (2)] Congress established and reaffirmed a national policy and commitment to:

> . . . improve the condition of the public rangelands so they become as productive as feasible for all rangeland values in accordance with management objectives and the land use planning process . . .

Sagebrush out-competes and excludes other plant species. Baxter's finding that sagebrush crown cover exceeding 10 percent caused decreases in herbaceous vegetation tends to bear this out.[a] Sagebrush-dominated plant communities tend to be very stable and persistent. West et al., Robertson, Sanders and Voth, and Anderson and Holte concluded that high density big sagebrush stands can endure for very long periods of time (in these studies livestock grazing was excluded as an influence).[b] This suggests that intervention is necessary to control sagebrush.

Baxter's findings also showed that sagebrush could effectively be thinned rather than eliminated using tebuthiuron which realizes the benefits and dependence of plant and animal species to the sagebrush ecosystem. The increased biodiversity generated from sagebrush thinning developed higher insect populations which in turn benefited species of birds rearing chicks.

The attached maps show areas of public rangeland in diminished ecological condition due to the high composition of sagebrush and low composition of desirable grasses, forbs, and shrubs (based on field studies of the area and data compiled from the USDA Natural Resources Conservation Service Ecological Site Guides). Through chemical methods, the Bureau of Land Management proposes to improve the ecological condition of these public rangelands.

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[a]Garth Baxter, Pesticide Specialist, Intermountain Region, Forest Service, "Management of the Sagebrush Grass Ecosystem," 29 October 1993. Garth Baxter, "Thinning Dense Sagebrush Stands with Spike 20P", Rangelands 20(3), June 1998

[b]N.E. West, F.D. Provenza, P.S. Johnson, and M.K. Owens, "Vegetation change after 13 years of livestock grazing exclusion on sagebrush semidesert in central Utah," Journal of Range Management 37 (May 1984):262-264; J.H. Robertson, "Changes on a grass-shrub range in Nevada ungrazed for 30 years," Journal of Range Management 24 (September 1971):397-400; K.D. Sanders and A.A.Voth, "Ecological changes of grazed and ungrazed plant communities," (Managing Intermountain rangelands–improvement of range and wildlife habitats, USDA, Forest Service General Technical Report INT-157, 1983):176-179; J.E. Anderson and K.E. Holte, "Vegetation development over 25 years without grazing on sagebrush dominated rangeland in southeastern Idaho," Journal of Range Management 34 (January 1981):25-29.

The goals of the project are:

Restore ecosystem function and condition from >10 percent crown cover to <10 percent.
Remove/reduce hazardous fuels (Dense sagebrush and tree-dominated sites can pose a fire hazard when fire conditions such as hot day and nighttime temperatures, low humidity and high winds prevail. Such conditions could ignite a catastrophic fire event).
Protect nearby private lands and structures from wildfire (Wildland/Urban Interface)
Minimize impacts on cultural resources
Minimize impacts on wildlife and special status species (plants and animals)
Minimize surface disturbance

Specific objectives are:

Reduce fuel loading of brush and trees by 50-80% within one year post-treatment
Increase native perennial grass cover by 60-75% within two years post-treatment

Increase native perennial forbs by 1-10% within two years post-treatment

Issues. Treatments would be designed to avoid areas with cliffrose to minimize impacts to mule deer winter range.

Conformance With Land Use Plan. The proposed action or alternatives addressed below are consistent with the Arizona Strip District Resource Management Plan (RMP) dated January 31, 1992, as amended April 1997, and are consistent with Federal, State and local laws, regulations, and plans to the maximum extent possible. Rangeland management was considered in the Vermillion Grazing EIS of 1979, which was subsequently adopted as management direction in the Arizona Strip District RMP of 1992 (I-1). The Vermillion Grazing EIS states: land treatment is proposed to improve range conditions (1-18).

In 2004, BLM issued the Record of Decision for the Arizona Statewide (LUP) Amendment for Fire, Fuels and Air Quality Management. This statewide LUP Amendment established desired future conditions, land use allocations, and management actions for the fire, fuels program and amended all existing LUP decisions concerning fire, fuel, and air quality treatments. These include chemical treatments to meet resource management objectives

This proposal is consistent with the Arizona Record of Decision for vegetation treatment on BLM lands dated July 23, 1991, and meets the Purpose and Need set forth in the Vegetation Treatment on BLM Lands in Thirteen Western States Final EIS (FEIS) of May 1991. The statutes, policy and planning criteria for the decision are set forth in the FEIS and Record of Decision.

RMP decisions applicable to this proposed action include:

GZ01 Manage rangelands in accordance with multiple-use objectives, requirements and provisions of established laws, regulations and BLM policies, and the Vermillion Grazing Environmental Impact Statement and Allotment Management Plans, which specify grazing systems, management facilities and land treatments.

GZ21 Vegetative treatment projects will be implemented where plant cover or soil productivity is being lost, to achieve a desired plant community, to improve habitat condition for wildlife or to meet activity plan objectives. Practices used to accomplish this include mechanical treatments, herbicide applications, biological treatments, prescribed fire, reseeding and construction of water control structures as described in the Vermillion Grazing Environmental Impact Statement (1979) and the Programmatic Vegetation Treatment on BLM-Administered Land Environmental Impact Statement (1991).

TE02 Prior to potentially disturbing activities or surface disturbing activities on public land, a special status species review will be conducted by a qualified specialist.

WS01 Manage vegetation cover toward ecological stability and sound long-term protective soil cover using mechanical, chemical, biological or fire methods as tools for accomplishment.

WL03 Improve wildlife habitat through construction and maintenance of habitat improvement projects.

This proposal is in conformance with Arizona's Standards for Rangeland Health and Guidelines for Grazing Administration, which were developed through a collaborative process involving the Arizona Resource Advisory Council and the Bureau of Land Management State Standards and Guides Team. The Secretary of the Interior approved the Standards and Guides in April 1997. The Decision Record, signed by the BLM State Director (April 1997) provided for full implementation of the Standards and Guides in all Arizona Land Use Plans.

The Arizona Strip Field Office is involved in a planning process that should result in a new RMP going into effect within the next few years. Ecological restoration was identified as one of the scoping issues for this planning process that is subject to public involvement and NEPA analysis. The outcome of this process could be new or modified management decisions that would supersede the current decisions. The scope of this EA is intended to cover conformance not only with the current decisions but also these future decisions. To accomplish this conformance determination after the new RMP goes into effect, BLM would review each proposed annual herbicide treatment project covered under this EA and modify it, as necessary, to ensure that it fully conforms to the new decisions.

II. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Proposed Action. Treat up to 34 thousand six hundred eighty five (34,685) acres of Wyoming big sagebrush as detailed below. The timetable for treatment could start as early as fall of 2005 and/or could stretch into subsequent years, depending on funding and workload capabilities. Past experience has indicated an ability to complete five to ten thousand acres per year. It is anticipated that this approximate level would continue but could be higher or lower.

At the anticipated level, actual application time for aircraft would be approximately two to five days per year.

Treatment	Acres
Chemical: tebuthiuron	
Aerial	34685

Table 1 shows the allotments, proposed chemical treatment (including rates of application), and approximate acreages.

Table 1.

Allotment	Treatment/Rate	Application Method	Acres
Chatterly	Chemical: tebuthiuron 0.4 lb/a	Aerial	429
Muggins Flat	Chemical: tebuthiuron 0.4 lb/a	Aerial	2004
Pratt Tank	Chemical: tebuthiuron 0.4 lb/a	Aerial	2270
Rock Canyon Tank	Chemical: tebuthiuron 0.4 lb/a	Aerial	1810
Fuller road	Chemical: tebuthiuron 0.5 lb/a	Aerial	2423
Franks Reservoir	Chemical: tebuthiuron 0.5 lb/a	Aerial	369
Coyote	Chemical: tebuthiuron 0.5 lb/a	Aerial	1000

Mainstreet	Chemical: tebuthiuron 0.4 lb/a	Aerial	17300
Whiterock-soapstone	Chemical: tebuthiuron 0.4 lb/a	Aerial	1300
Wolfhole Canyon Spring	Chemical: tebuthiuron 0.4 lb/a	Aerial	960
Clay Spring	Chemical: tebuthiuron 0.5 lb/a	Aerial	1300
Blake Pond	Chemical: tebuthiuron 0.5 lb/a	Aerial	3520

The proposed treatment areas would include portions of T. 39, 40N., Rs. 1, 2, 3W., & T. 41,42 N., Rs 1, 2, 3, 4E., T35,36,38,39,40,41N., Rs 9,10,11,12,13W..(refer to map) These treatments would be paid for by BLM and permittees.

A pellet form of the herbicide tebuthiuron, which is trade named Spike 20P would be used for the proposed vegetation treatments. Spike 20P pellets are composed of 20 percent tebuthiuron--the active ingredient--and 80 percent inert ingredients, including clay which acts as a surfactant. Spike pellets are applied to the soil surface where the tebuthiuron is subsequently water activated in the soil and absorbed by the roots of a plant. Tebuthiuron is then translocated within the plant, mostly in the xylem, to the leaves where it inhibits photosynthesis. The spike pellets would be applied using a fixed-wing aircraft, equipped to precisely dispense the spike pellets at a rate of 0.4 lb. and 0.5lb of active ingredient per acre.

Objectives are: (1) decrease sagebrush composition from 50 to 75 percent to approximately 10 percent; and (2) by releasing associated vegetation from competition with sagebrush, increase the composition of perennial grasses to 60 to 75 percent, increase forbs to 1 to 10 percent, and maintain shrubs between 10 to 30 percent. After sagebrush reduction, herbaceous vegetation would propagate through plant tillering or below ground vegetative reproduction, sprouting and also the native seed source which already exists, precluding the need for reseeding.

Management treatments and project design features relating to vegetation treatment activities are presented in the Vegetation Treatment on BLM Lands in Thirteen Western States, FEIS pages 1-33 to 1-35. All mitigation measures adopted in the ROD are incorporated as additional project design features. In addition, site specific project design would include: defer livestock grazing for two years during the growing season and cliffrose patches would be identified and avoided.

No Action Alternative. This alternative would be to continue managing the vegetation as it currently exists. Sagebrush dominated plant communities tend to be very stable and persistent. West et al., Robertson, Sanders and Voth, and Anderson and Holte concluded that high density big sagebrush stands can endure for very long periods of time.[2] So no action would keep these stable states in high sagebrush plant composition without change to more favorable plant composition for long periods of time.

[a]Garth Baxter, Pesticide Specialist, Intermountain Region, Forest Service, "Management of the Sagebrush Grass Ecosystem," 29 October 1993.

[2]N.E. West, F.D. Provenza, P.S. Johnson, and M.K. Owens, "Vegetation change after 13 years of livestock grazing exclusion on sagebrush semidesert in central Utah," Journal of Range Management 37 (May 1984):262-264; J.H. Robertson, "Changes on a grass-shrub range in Nevada ungrazed for 30 years," Journal of Range Management 24 (September 1971):397-400; K.D. Sanders and A.A.Voth, "Ecological changes of grazed and ungrazed plant communities," (Managing Intermountain rangelands–improvement of range and wildlife habitats, USDA, Forest Service General Technical Report INT-157, 1983):176-179; J.E. Anderson and K.E. Holte, "Vegetation development over 25 years without grazing on sagebrush dominated rangeland in southeastern Idaho," Journal of Range Management 34 (January 1981):25-29.

Alternatives considered but not analyzed. Prescribed burning would provide similar results to that of herbicide usage. However because of the presence of cheat grass in these areas burning alone only

propagates annual cheat grass monocultures. Therefore, any future monocultures of cheat grass would create more hazardous fuel conditions than the present existing conditions. This would limit the potential to achieve satisfactory results using prescribed burning in relation to reducing the hazardous fuels in the treatment area. Also, fire would cause a temporary loss of grass and litter cover thus exposing the soil to erosion. Prescribed burning is best used when follow up seeding is planned, which is not the case with this proposal. Smoke release from a prescribed burn could also be a concern.

The alternatives for use of manual, mechanical, and biological methods have been analyzed in the Vegetation Treatment on BLM Lands FEIS and considered in the ROD. Further discussion in this EA is unnecessary since site specific conclusions and impacts would be essentially the same. The FEIS and ROD are available for public review at any BLM office in the western States.

III. AFFECTED ENVIRONMENT

The Arizona Strip Field Office is located in the northwest portion of Arizona, and the proposed treatment areas are approximately 10 miles south, southeast and 15 to 45 miles east of the town of Fredonia, Arizona. The western portions of the proposed treatment area are found 45-50 miles south, and southeast of St. George, Utah. Topography is open, semiarid range with sloping, rolling, or flat terrain. Elevation ranges from 4700 to 5500 feet, temperatures average 30 degrees in the winter and 90 degrees in the summer, and precipitation averages 11 to 12 inches annually. A general description of the affected environment may be found in the FEIS.

The following critical elements of the human environment are not present or are not affected by the proposal in this EA:

Air Quality
Areas of Critical Environmental Concern
Cultural Resources
Farm Lands (prime or unique)
Flood plains
Native American Religious Concerns
Environmental Justice
Wastes (hazardous or solid)
Wetlands/Riparian Zones
Wild and Scenic Rivers
Wilderness

Resources Brought Forward for Analysis The following resources could possibly be affected by the proposed action.

Water Quality (drinking/ground) Surface water resources at the proposed treatment areas consist of stock ponds and intermittent surface flows which occur after precipitation events. These are suitable for livestock and wildlife use, but unsuitable for human consumption. Ground water is 600 plus feet deep.

Watershed. Soil parent material is alluvium from either limestone or sandstone. Depth class ranges from shallow to very deep and erosion potential ranges from moderate to critical. Sediment is produced at the proposed treatment areas on watersheds dominated by big sagebrush and in drainages devoid of ground cover.

Vegetation. Vegetative composition at the proposed treatment areas is a sagebrush-grass community. Wyoming big sagebrush is the main constituent of the shrub component--with snakeweed, fourwing saltbush, Mormon tea, and cliffrose as lesser constituents. The latter three are palatable to both wild and domestic ungulates. Perennial grasses include blue grama, galleta, Indian ricegrass, needlegrasses and

squirreltail. The forb component is rather limited, composed mainly of desert globemallow. Current composition is 50 to 75 percent shrubs and 25 to 50 percent grasses.

Wildlife. Mammals typical of the area include mule deer, pronghorn antelope, coyote, jackrabbit, ground squirrel, and various rodents. Common birds include crows, ravens, and red-tailed hawks, with possible occasional "flyovers" by protected species such as condors, eagles, falcons, etc. Reptiles are mostly various species of small lizards (refer to the Kanab Creek Habitat Management Plan for a comprehensive list of wildlife species).

Special Status Species. An experimental population of the endangered California Condor was reintroduced on the Arizona Strip in 1996. The primary release site for this population of condors is located atop the Vermilion Cliffs on the Paria Plateau. Currently, there are 55 condors in Arizona. Condors have been thought to spend the majority of their time within a few miles of the Vermilion Cliffs release site. However, recent telemetry data indicates they may travel hundreds of miles. Condors released on the Strip have on rare occasions flown to parts of Arizona, Utah, Wyoming, Colorado, and California, however, they typically return after short periods.

No other listed, proposed, candidate, or special status species are known from the area of the proposed action.

Visual Resources. The objective of Class II is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

The objective of Class III is to partially retain the existing character of the landscape. The level of activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape. Class III allows moderate change to the landscape which may attract attention, but should not dominate the view of the casual observer. The proposed treatment sites would appear as a mosaic of gray green sagebrush, green or gold grasses, and brown and gray soil exposures.

The objective of Class IV is to provide for management activities that require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. Every attempt should be made, however, to minimize the impact of these activities through careful location, minimal disturbance and repeating the basic elements. The proposed treatment sites appear as a mosaic of gray green sagebrush, green or gold grasses, and brown and gray soil exposures.

Table: 2

Allotment	VRM Classes
Blake Pond	IV
Chatterly	IV
Clay Spring	IV
Coyote	II
Franks Reservoir	IV
Fuller road	IV
Mainstreet	II, III, IV
Muggins Flat	III, IV
Pratt Tank	III, IV
Rock Canyon Tank	IV

Whiterock-soapstone	IV
Wolfhole Canyon Spring	II, IV

Recreation: Primary activities that occur in the area are hunting and back country touring (sightseeing by vehicle). Off-highway vehicle travel in the area is limited to existing roads and trails.

These Allotments are considered to have recreation values for their geology, scenic view sheds, and remoteness. General recreation activities might include: Sight seeing, horseback riding, hiking, camping, hunting, rock collecting, photography, bird watching and nature study. The Recreation Opportunity Classifications for each allotment are shown in table: 3

Table: 3

Allotment	Recreation Opportunity Spectrum Classes
Blake Pond	SPNM, SPM, RN
Chatterly	SPM, RN
Clay Spring	SPM
Coyote	SPNM, SPM, RN
Franks Reservoir	SPNM, SPM, RN
Fuller road	SPNM, SPM, RN
Mainstreet	SPNM, SPM, RN
Muggins Flat	SPNM, SPM, RN
Pratt Tank	SPM, RN
Rock Canyon Tank	SPM
Whiterock-soapstone	SPNM, SPM, RN
Wolfhole Canyon Spring	SPM, RN

Recreation Opportunity Spectrum Classes
Primitive: P
Semi-Primitive Non-Motorized: SPNM
Semi-Primitive Motorized: SPM
Roaded Natural: RN
Rural: R
Urban: U

IV. ENVIRONMENTAL CONSEQUENCES

The actions described in Section II of this assessment which could cause environmental effects are presented in Chapter 3 and summarized in Table 1-9 (Alternative 1) of the FEIS. The FEIS found that the actions analyzed would have no impacts of importance upon the following resources; climate, topography, minerals, utilities, communication sites and energy use.

No effects have been identified which exceeds those addressed in the FEIS and the proposal referenced in Section II of this assessment. The following are effects of importance based upon site specific analysis of the proposal.

Impacts of the Proposed Action. The analysis below is to determine the extent of environment impacts associated with the proposed action.

Water Quality. Infrequent, high-intensity rain storms would be the most important potential factor in transport of tebuthiuron pellets into surface waters. However, tebuthiuron pellets are designed to disperse into the soil, in place, when saturated with water.

In addition, tebuthiuron is applied at a low concentration of 0.4 and 0.5 pound of active ingredient per acre and, combined with the large quantity of water produced during intensive rain storms, would dilute substantially. One hundred foot buffers would be established around surface waters such as stock ponds to reduce the possibility of tebuthiuron getting into the water. The closest riparian habitat, Kanab Creek, is 5 miles away, and would likely be unaffected if high-intensity storms caused some movement of tebuthiuron.

Leaching and a shallow water table are the two main factors which could influence movement of tebuthiuron into ground water. Tebuthiuron is a relatively persistent herbicide with an average half-life in soil of one year, a susceptibility factor in leaching. Nevertheless, given the water table depth of 600 feet or greater at the proposed tebuthiuron application sites, it is improbable tebuthiuron could leach that deep into ground water. In addition, tebuthiuron is bound tightly to clay particles, and the native soils contain about 30 percent clay. This would preclude leaching of most of the tebuthiuron.

Watershed. Tebuthiuron treatments would have insignificant effects on soil erosion, since existing litter would remain in place on the soil surface; Achieving the goal of the treatment: to reduce sagebrush and increase herbaceous vegetation, would reduce current levels of soil erosion and resultant sediment production.

Vegetation. Changes to the plant composition would result from treatment. The present plant composition is 50 to 75 percent shrubs and 25 to 50 percent grasses. Within two to three years after treatment plant composition should range from 10 to 30 percent shrubs, 60 to 75 percent grasses, and 1 to 5 percent forbs.

Tebuthiuron when applied at the rate of 0.4 lb. of active ingredient per acre is quite species specific. An 80-90 percent sagebrush and somewhat less Pinion/Juniper tree kill is expected. Cliffrose is also susceptible, though it's killed at a lower rate than sagebrush. Patches of cliffrose would be avoided during treatment, precluding most of the impact to this species. The majority of snakeweed, fourwing saltbush, and Mormon tea would not be impacted; and grasses and forbs should flourish after the first growing season following application.

After treatment, plants produce tender growth, which animals tend to relish. To mitigate potential harm to plants, livestock grazing would be deferred during the growing season for two years. However, grazing by jackrabbits cannot be controlled and may affect plants early on.

Wildlife. Sagebrush treatment may displace some wildlife species. Shrub nesting birds could be displaced to nontreatment areas, though dead sagebrush would be left standing after treatment and could serve as nesting sites. Most common birds which inhabit the area are not shrub nesters. Mule deer may feed on sagebrush if other palatable shrubs are not available, but prefer more palatable shrubs such as cliffrose and fourwing saltbush. Some mule deer may possibly be displaced to nontreatment areas. Pronghorn, coyotes, rabbits, rodents, reptiles, and protected species should largely be unaffected. The impact of treatment on rodents would be the availability of more grasses for their diet. Also, the ecotone or edge effect and increased vegetation diversity subsequently created by sagebrush treatments is known to benefit wildlife.

Risks from exposure to tebuthiuron have been assessed for the American kestrel and pronghorn antelope, two of the wildlife species which inhabit the Arizona Strip District. LD_{50} is the criterion used to assess

risk to wildlife and is defined as "the dosage of toxicant, expressed in milligrams of toxicant per kilogram of animal body weight, required to kill 50 percent of the animals in a test population when given orally." For a typical rangeland application of tebuthiuron, the associated risk to the American kestrel is .3% of the LD_{50} and the risk to pronghorn antelope is .09% of the LD_{50}. These are considered negligible risks under Environmental Protection Agency guidelines.[c]

Special Status Species. Because California Condors can travel long distances, they could be found most anywhere on the Arizona Strip, including the area of the proposed action. The release site at the Vermilion Cliffs is characterized by rugged sandstone cliffs and includes the necessary remoteness, ridges, ledges, and caves favored by condors. In contrast, the area of the proposed treatment is characterized by rolling hills and flat lands with dense stands of sagebrush. The treatment area lacks features necessary for roosting or nesting activity. If condors were to use the area, it would most likely be for foraging. California condors are opportunistic scavengers, preferring carcasses of large mammals such as deer, elk, bighorn sheep, range cattle, and horses. Most California Condor foraging occurs in open terrain.

The nature of tebuthiuron application is such that crop dusting aircraft are used at extremely low altitudes. The potential exists for condors to be disturbed by aircraft. In the worst case, condors may collide with aircraft. However, because of the specific, targeted nature of herbicide applications and seedings, implementation of proactive conservation measures, and the ability to avoid condors during these flights, the potential for adverse effect is considered very low.

California condors may also be indirectly affected by ingestion of materials or waste products associated with the herbicide or its residues. Affects of ingestion may not be immediately harmful, but long term exposure to such materials may ultimately lead to reduced fitness, illness, or mortality. While condors may pick up and ingest foreign objects, they are typically attracted to shiny objects such as metal. The clay-based Spike pellets are non-reflective and are small enough to be essentially undetectable to humans from altitudes of greater than 50 feet. A greater risk would be associated with condors feeding on carcasses of dead animals that had ingested the herbicide pellets. For a typical rangeland application of tebuthiuron, the associated risk to the American kestrel and pronghorn antelope are considered negligible under Environmental Protection Agency guidelines. As a result, the risk to California Condors is considered to be negligible.

BLM has determined that implementation of the proposed action may affect but is not likely to adversely affect the experimental non-essential population of California Condors on the Arizona Strip.

Visual Resources. A moderate contrast in the color and texture of the vegetation would be created by the treatments. Gray green, grainy textured sagebrush would transition to grayish hues. Green or gold, fibrous textured grasses would increase and brown and gray soil exposures would diminish. In 5 to 10 years recurrence of some sage would serve to blend or transition the contrast created between the treated and untreated areas. Feathering of edges would be used where possible to reduce straight line affects and mosaic treatment lines overall.

Recreation: Hunting and sightseeing opportunities in the proposed treatment areas are limited and probably would be unaffected.

Risks to the public from the use of tebuthiuron in rangeland treatments were delineated through animal

[c]U.S. Department of the Interior, Bureau of Land Management, Vegetation Treatment on BLM Lands in Thirteen Western States, Environmental Impact Statement, (May 1991): Appendix E7-1 to E8-13.

testing and herbicide exposure analysis. Animal species having similar metabolism and organ systems to that of humans were used to determine the dose levels of tebuthiuron which produced no observed chronic, subchronic, or reproductive/developmental toxicity. Also, hypothetical herbicide treatment situations were analyzed to determine herbicide doses members of the public could realistically be exposed to through skin contact and ingestion. Based on this, the tebuthiuron dosage at which no observed systemic toxicity or reproductive effects occurs in test animals is more than 100 times greater than the representative dosage a member of the public might be exposed to on rangelands treated with tebuthiuron. In addition, available evidence indicates that tebuthiuron is non-carcinogenic and nonmutagenic.[d]

No Action Alternative The no action alternative assumes that management of resources and uses on public lands in the treatment areas area would continue under existing situations. Sagebrush and invading pinion and juniper trees would continue to dominate the said areas. Over time species diversity would continue to decline and eventually become a site driven by woody species with little to no herbaceous under story. None of the environmental impacts associated with the proposed action would occur under this alternative. Additionally, none of the anticipated benefits of the proposed action would be realized. Other impacted and sensitive resources would not receive adequate levels of management attention.

It is often assumed that the no action alternative has no consequential impacts. However, in the case of resource management in the proposed treatment areas the following would be considered impacts from the no action alternative. The existing stands of sagebrush would continue to increase while under story species decreases. As these vegetation communities become monotypic in composition and structure, species diversity is lost. When the symbiotic relationship between flora and fauna is starved, diversity is lost, soils become less productive, watersheds non-functional, and water quality degraded, which would ultimately result in long-term negative impacts to the area.

Water Quality (drinking/ground). The alternative would not have substantial impacts on water quality. However, some adverse impacts would occur if no action is taken. Some silt loading would occur to ephemeral streams and wash runoff because sagebrush dominated sites have less understory to hold the soil. Conditions would continue to be regulated by storm events and overland water flow from these events. Short term water quality would not be affected. However, overall long term water quality would not be improved if conditions do not change.

Watershed. With chemical methods not employed, more prescribed burning and mechanical treatments would be utilized than with the other alternatives. Therefore the treatment methods occurring are greater than under the other alternatives. Soils would be more susceptible to erosion after prescribed burning and mechanical methods. During the initial regrowth of woody and herbaceous plants some soil would leave the site due to lack of plant cover. Because no herbicide would be used the impacts associated with herbicide use would not apply.

Vegetation. With no use of herbicide, chemical control of some target species would not be possible because of lack of suitable substitute treatments. Vegetation treatment on open rangelands would have to be replaced by manual or mechanical methods to the extent possible or not done at all. The latter option would compromise maintenance methods of existing treatment areas as well as contribute to species diversity loss due to vegetative communities becoming monotypic in nature.

[d] Ibid., Appendix E3-1 to E5-29.

Wildlife. Important species that would be affected (mule deer and pronghorn) if No Action allowed existing conditions to continue – would be continued encroachment of shrubs and woodlands, high intensity wildfire in long term and invasion of exotic species to the site. Wildlife would be negatively impacted by the end term of post fire conditions. With only encroachment of exotic species of little forage or cover value, the system would be considered highly degraded as wildlife habitat. The long term effects would be fewer wildlife species present as well as decreased numbers of present species.

Special Status Species. The alternative would have no effect on special status species.

Visual Resources. The proposed treatments are inside areas designated Visual Resource Management Class II, III, and IV. The long term visual resource would continue to degrade as shrubs and trees age become decadent and encroach into open space. Visual sight distance is decreased as shrubs and trees encroach into new areas. Visual sight distance is further decreased as pinion and juniper continue to become more dense. Shrubs are then out competed and the resource left is with low tone colors, no undulating horizon, low distance visibility and few broken textures.

Recreation. Long term increase in pronghorn and mule deer leads to increased hunting opportunity. Degraded habitats could adversely affect some huntable/viewable wildlife.

Cumulative Effects. The Council on Environmental Quality regulations defines cumulative impacts or effects as: "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

Many small vegetative augmentation projects, cumulatively, would alter the composition of 615,000 acres of Wyoming Big Sagebrush dominated ecological sites on the Arizona Strip District. This would constitute change from predominately sagebrush with an understory of various perennial grasses to predominately native perennial grasses. Optimum composition for most sagebrush grass communities on the Arizona Strip District is approximately 25 percent shrubs and 75 percent grasses, a situation which mimics pre European settlement conditions. The sum of tebuthiuron treatments is approximately 88,000 acres present and past, or 14 percent of sagebrush dominated ecological sites, and is not considered significant. For reasonable foreseeable treatments 50,000 would be an approximate total acreage over the next five years. For an additional discussion on cumulative impacts within the District see the Arizona Strip District Resource Management Plan and Environmental Impact Statement Page III-34.

Recommended Mitigating or Enhancing Measures.

Standards and guidelines in BLM Handbook Section 9011 (Pesticide Storage, Transportation, Spills, and Disposal) Section II would be met. This defines standards for storage facilities, posting and handling, accountability, and transportation. It covers spill prevention, planning, cleanup, and container disposal requirements.

Feathering of treatment edges would be used to reduce straight lines and produce a mosaic of edges.

Areas of cliffrose would be flagged and avoided.

Livestock grazing would be deferred for two years during the growing season.

One hundred foot buffers would be established around surface water to reduce the possibility of tebuthiuron getting into the water.

California Condor mitigation measures would be followed (Appendix 1.)

Monitoring. Inspection and monitoring of the proposed treatment areas would be done annually.

V. CONSULTATION AND COORDINATION

This document underwent internal review (Arizona Strip Field Office). The BLM specialists conducting this review were:

Gloria Benson, Native American Coordinator
Tom Folks, Recreation
Laurie Ford, Lands/Realty/Minerals
Michael Herder, Wildlife
John Herron, Cultural
Lee Hughes, Plants
Linda Price, S&G
Bob Sandberg, Range
Richard Spotts, Environmental Coordinator
Ron Wadsworth, Supervisory Law Enforcement

The Notice of Availability for this EA was sent to those on the ASFO NEPA mailing list during the public comment period. This document was posted on the BLM ASFO web site. The NOA letter was sent to all grazing permittees with allotments covered under the proposed action.

_____
Signature of P & E C

FINDING OF NO SIGNIFICANT IMPACT

Based on the analysis of potential environmental impacts contained in this environmental assessment, I have determined that the proposed action would not have a significant effect on the human environment and therefore an environmental impact statement will not be prepared.

_____ _____
Field Manager, Arizona Strip Field Office Date

DECISION RECORD
Buckskin/Shivwits Fuels Reduction and Ecological Restoration
on the Arizona Strip
DR-AZ-110-2005-0027

DECISION: It is my decision to authorize the proposed action described in EA # AZ-110-2005-0027, a sagebrush/tree fuels reduction treatment project on approximately 34,685 acres of public lands administered by the Arizona Strip Field Office. The intent of this treatment is to reduce the woody species composition within the identified treatment areas, thereby reducing the fuel loading and lowering the potential for high intensity, catastrophic fires. This project will aid in achieving desired plant community objectives and improve ecological condition by reducing sagebrush/tree composition and increasing grass and forb composition.

MITIGATION AND CONDITIONS

Standards and guidelines in BLM Handbook Section 9011 (Pesticide Storage, Transportation, Spills, and Disposal) Section II will be met. This defines standards for storage facilities, posting and handling, accountability, and transportation. It covers spill prevention, planning, cleanup, and container disposal requirements.

Feathering of edges will be used to reduce straight lines and produce a mosaic.

Areas of cliffrose will be flagged and avoided.

Livestock grazing will be deferred for two years during the growing season.

One hundred foot buffers will be established around surface water to reduce the possibility of tebuthiuron getting into the water.

California Condor mitigation measures will be followed

CC1B. Immediately prior to the start of a permitted project, BLM will contact personnel monitoring California condor locations and movement on the Arizona Strip to determine the locations and status of condors in or near the project area.

CC2B. Where California condors visit a worksite while activities are underway, the on-site supervisor will notify the BLM wildlife team lead or condor biologist. Project workers and supervisors will be instructed to avoid interaction with condors. Project activities will be modified, relocated, or delayed if those activities adverse affects on condors. Operations will cease until the bird leaves on its own or until techniques are employed by permitted personnel which results in the individual condor leaving the area.

CC7B. Aircraft use, especially low level flights along the rim of the Vermilion Cliffs and flights near the

condor release site at Vermilion Cliffs, will be minimized to the greatest extent possible in order to avoid disturbance to condors which may be present. Known active nest sites will be avoided.

CC8B. The BLM condor biologist or Wildlife Program Lead will contact the Peregrine Fund, as appropriate, immediately before operations involving aviation begin to check on possible locations of condors in the subject area.

CC9B. All BLM-authorized aviation personnel will be provided literature and/or instructed regarding condor concerns prior to conducting aerial operations.

CC10B. Aircraft will maintain and maximize safe flying separation distances from condors of at least 400 meters, in order to avoid, flying condors. Aircraft will also keep a minimum of 0.25 miles away from condors located on the ground unless safety concerns override this restriction.

CC11B. BLM will implement the protective measures for California condors that are contained in the March 2004 "Recommended Protection Measures for Pesticide Applications in The Southwest Region of the U.S. Fish and Wildlife Service."

Monitoring. Inspection and monitoring of the proposed treatment areas will be done annually on the areas listed below.

Gila and Salt River Meridian

The treatment areas include portions of

T. 35N R. 11 W., Sec. 7, 8, 9, 10, 15, 16, 17, 18, 20, 21, 22,
T. 36N R. 11, W., Sec. 6, 7, 8, 17, 18, 19, 20, 30
T. 36N R. 12, W., Sec. 1, 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 34
T. 38N R. 10, W., Sec. 17, 18, 19, 20, 29, 30, 31, 32
T. 38N R. 11, W., Sec. 2, 3, 4, 5, 6, 8, 9, 10, 11, 13, 14, 15, 16, 21, 22, 23, 24, 25, 26, 27, 28, 33, 34, 35, 36
T. 38N R. 12, W., Sec. 3, 4
T. 39N R. 1, W.,
T. 39N R. 2, W., Sec. 3, 4, 5
T. 39N R. 11, W., Sec. 5, 6, 7, 31, 33, 34, 35
T. 39N R. 12, W., Sec. 1, 11, 12, 13, 14, 30, 31, 32, 33, 35
T. 40N R. 1, W., Sec. 27, 28, 33, 34
T. 40N R. 2, W., Sec. 34
T. 40N R. 1, E., Sec. 7, 8, 9, 17
T. 40N R. 11, W., Sec. 19, 20, 28, 29, 30, 31, 32
T. 40N R. 12, W., Sec. 24, 25, 35, 36
T. 41N R. 1, W., Sec. 12, 24, 25
T. 41N R. 1, E., Sec. 7, 19, 20, 21, 28, 29, 30

T. 41N R. 2, E., Sec. 3, 6, 7, 18, 19, 22, 23, 24, 25, 26, 35
T. 41N R. 3, E., Sec. 17, 18, 19, 30
T. 42N R. 2, E., Sec. 31, 34

Objectives are: (1) decrease sagebrush composition by weight (CBW) from 50 to 75 percent to approximately 10 percent; and (2) release associated vegetation from competition with sagebrush, increase the composition of perennial grasses to 60 to 75 percent, increase forbs to 1 to 10 percent, and maintain shrubs between 10 to 30 percent. After sagebrush reduction, herbaceous vegetation will propagate through plant tillering or below ground vegetative reproduction, sprouting and also the native seed source which already exists, precluding the need for reseeding. (3) Reduce heavy fuel loading.

RATIONALE: The Arizona Strip Resource Management Plan of 1992 as amended in April of 1997, specifically addresses and provides for vegetation treatments to manage those vegetative and soil resources so that they are as productive as feasible for multiple- use values.

The soil, water and air, wildlife habitat, vegetation and forest management, and livestock grazing, as well as fire management sections of the RMP each address and specifically discuss vegetation treatments as a viable and integral part of the overall management direction. (See decision numbers WL 07, WS 01, GZ 06)

It is widely held that there has been an overall increase of woody species and fuel buildup over the Arizona Strip and the west, at the expense of grasslands and other more herbaceous oriented plant communities. There are many and varied views as to the cause of this phenomenon, from livestock grazing to fire suppression and climatic change. Regardless of the cause, the consensus is that overall there is a higher composition of woody species than is desired and a corresponding lack of plant diversity within many of the woody dominated communities.

This project is aimed at precisely that issue and is deemed the most appropriate means to accomplish the objective for these sites, in that it is safer than fire, given the fuel loads and the flame lengths encountered in these fuel types. The logistics are less complex, more certain of completion and less costly than fire and less ground disturbing than fire or mechanical methods.

Since this type of treatment is less ground disturbing than other methods, it is less conducive to the propagation of invasive species and results in an increase in the native grass and forb components without the risks of increases in noxious or other invasive species.

The application rate is extremely light and has effects that are specific to the woody target species while promoting the native grass and herbaceous species, resulting in a more species rich and diverse plant community that can more easily support a natural fire regime of less intensity than would otherwise occur. The resulting community is more healthy since it more closely resembles the species composition outlined in the ecological site guides, is less susceptible to catastrophic fire, provides more effective ground cover and reduces erosion rates and supports a greater diversity of dependant wildlife species.

The resulting community is more conducive to all management activities and allows the manager to achieve the long term desired plant community objectives and meet the varied demands placed on the dependent resources.

PUBLIC INVOLVEMENT

A Notice of Availability of the EA # AZ-110-2005-0027 was sent out 4/18/05 to a broad range of interested publics and posted on the ASFO web page. Two sets of comments were received.

One commenter expressed reservation about the project and felt that the location of the treatment areas should be more clearly identified.

Response*: Legal descriptions of the areas involved along with a listing of the livestock grazing allotment within which the treatments will occur were provided. In addition maps of the locations were provided. We have developed more precise maps and included a more specific location description.*

The commenter expressed that the EA lacked sufficient site-specific information about conditions on the treatment areas.

Response*: The EA described that the proposed treatment areas exceeded the desired composition of woody species and had less than the desired composition of grass and forbs, with an overall reduced species diversity than is desired. It was described that this condition exists in all of the proposed treatment areas which is the reason for the need to treat them. The target species to reduce, as well as those to increase, were thereby identified along with the non target species which occur in the proposed treatment areas. The descriptions identified the fact that no threatened, endangered or special status species exist in or are dependent on the specific areas identified for treatment. Visual resource management classes for the areas were identified, as were the wildlife species which could be present and possibly affected. The affected recreation opportunity spectrum classes were identified. Water quality and Watershed was addressed, although the discussion could have explained more fully that in the existing state the proposed treatment areas generally have higher erosion rates and contribute more sediment to Colorado River tributaries than desired, which obviously is of a lesser water quality than a similar site with a greater herbaceous component would produce. Each site was evaluated as to the presence, or applicability, of the critical elements of the human environment as required. Arizona Strip professional staff are intimately familiar with the treatment sites and the specifics of each and have thoroughly collaborated in the preparation and analysis of this proposal, resulting in this decision.*

As direction for management, BLM's LUP (land Use Plans) state that hazardous fuel loads inside and outside the wildland- urban interface (WUI) are addressed by the appropriate use. The appropriate use type may be fire, mechanical, biological or chemical. During site specific analysis and field surveys of each treatment area, it was determined by BLM specialists that the areas proposed to be treated, contained an over abundance of sagebrush. It was also noted that there was a lack of herbaceous perennial vegetation as components to the proposed treatment areas. Objectives for treating an over

abundance of sagebrush are to reduce firefighter risk, decrease wildfire severity, intensity and restore the sagebrush steppe ecosystem.

The commenter expressed concern that the EA did not address the cause of any existing over-abundance of big sagebrush, asserting that the reason for the existing conditions is due to the fact that livestock grazing is permitted in these proposed treatment areas. They further expressed concern that decisions about treatment should be integrated with grazing management decisions and not separately.

***Response**: It is widely held that there has been an overall increase of woody species and fuel buildup over the Arizona Strip and the west, at the expense of grasslands and other more herbaceous oriented plant communities (Pieper 1991, Baxter 1994, Winward 1991). There are many and varied views as to the cause of this phenomenon, from livestock grazing to fire suppression and climatic change. Regardless of the cause, the consensus among BLM specialists is that overall there is a higher composition of woody species than is desired and a corresponding lack of plant diversity within many of the woody dominated communities, which is the condition of the proposed treatment sites.*

As such these sites do not meet the objective stated in the 1992 RMP of managing these vegetative and soil resources so that they are as productive as feasible for multiple- use values.

All but two of the proposed treatment sites have been evaluated through the Arizona Standards and Guidelines process and that process has determined that current permitted livestock grazing is not the cause of the condition of these sites. Several of these evaluations have recommended treatment of sites in the described conditions of the proposal. Additionally these sites are located in grazing allotments covered by allotment management plans which prescribe grazing seasons and systems, provide for periods of rest from grazing, establish levels of grazing use within established carrying capacity of the existing vegetative communities and which also identify the need for vegetative treatments. These management plans are monitored and evaluated as to the grazing levels and practices to ensure that use levels are in harmony with the other resources and consistent with multiple use management. It is therefore BLM's position that these projects are being fully integrated with decisions on all management activities and not being treated separately.

The commenter asserts that BLM has based its decision on faulty information and failed to consider the best available scientific information.

***Response**: There is a considerable bank of information on the management of sagebrush communities and as in any field, there are differences of views and interpretation of results (Winward 1991, McDaniel et al 1992, Johnson et al 1993, Whitson 1988). The references provided by the commenter dealt with mountain big sagebrush rather than basin big sagebrush which occurs here on the Arizona Strip. The ecological sites occupied by and climatic conditions under which mountain big sagebrush occur are considerably different than those of the Arizona Strip and so are not applicable to the treatment sites. The mountain big sage sites are generally higher elevation and higher precipitation than those encountered here on the Strip. The timing of the precipitation is also different than the patterns here and the soils are*

generally different parent material than those at the treatment sites. Often, the canopy closure and sagebrush composition is not as high in mountain big sage communities as those typically found on the Strip and in those that exist in the proposed treatment sites.

BLM has looked at and evaluated similar treatments as those evaluated here, that have been completed on BLM and other associated lands here in the Arizona Strip. In treatments with similar conditions as those in this proposal, our experience has shown that the results achieved are in line with the analysis in the EA. Generally the reduction in sagebrush composition is replaced by grass and other herbaceous species.

The Fredonia office of the Natural Resources Conservation Service conducted an evaluation of six treatment sites on the Arizona Strip similar to those proposed(Report available in BLM office files). This evaluation which was conducted from 1988 thru 1994 and compared pre and post treatment conditions, revealed the following:

All sites had produced 70% or more sagebrush and 25% or less perennial grass, pre-treatment.

Where treatment reduced sagebrush by 75% or more, the above figures were reversed in 2 – 3 years post treatment in all but one site.

Sagebrush crown cover was replaced by basal cover of herbaceous species in 3 – 5 years

There was no evidence that perennial forbs were adversely affected.

This area specific information bears out the findings of those reported by Baxter and indicates that the assumptions and objectives outlined in the EA are accurate and will be attained on the proposed treatment sites.

Concern was expressed that the EA did not identify all of the potentially significant negative environmental impacts of the reduction of sagebrush as identified in the proposal.

***Response**: Without information describing significant negative environmental impacts, it is difficult to address this concern. It is BLM's position that the environmental impacts of the proposal are overwhelmingly positive.*

Fire risk and intensity will be reduced as evidenced by the fact that closed canopy sagebrush can easily sustain 15 ft. plus flame lengths on hot windy days (100 deg.F,5% RH, 12 MPH wind, BEHAVE Fire Behavior Prediction System), whereas the herbaceous community produced post treatment would sustain flame lengths of 2 to 4 ft. under the same conditions.

Tebuthiuron is somewhat non-selective at higher rates yet it is quite species specific at lower rates like those proposed. Sagebrush is one of the most susceptible shrubs even at the lower rates, which is the

reason for the proposed rates. Cliffrose is variably susceptible to the active ingredient, which is the reason for the mitigation of identifying areas for treatment that contain small amounts cliffrose and avoiding those areas within the treatment that do contain cliffrose. Other species such as four-wing saltbush, Mormon tea, cactus and yucca species are not affected. Perennial grass species are not affected unless the application rate is more than double that of the proposal, which is the reason for the low application rate.

Invasive species are inhibited by the increased production of native grass and forbs which is precisely the objective of the treatment, to create a more healthy sustainable community.

The resultant community being more diverse, creates more niches for a more rich dependent wildlife community and creates food patches in an otherwise continuous monoculture. Observations indicate that antelope are found moving into these treatment sites where they did not venture before treatment; mule deer are attracted to the food resource produced through treatment where they made little use before.

It is also important to note that consultation and coordination took place through internal review by BLM specialists in all disciplines to identify any negative impacts.

Finally, the commenter noted that the EA states at one place that grazing will be deferred for two years following the treatments, but it states elsewhere that grazing will be deferred only during the growing season and that the EA should be revised to make clear that no grazing will be permitted on treated areas for two years following treatment.

***Response**: The EA has been revised to say the treatment areas will be deferred for two years during the growing season to be consistent. Evidence has shown that grazing during the dormant season has little effect on perennial grasses or shrubs treated with tebuthiuron.*

Another commenter suggested that there are special status species in the project area. It was recommended that if the species do not inhabit areas proposed for treatment then that should be stated in the EA. Furthermore, if these species do inhabit areas adjacent to or within treatment sites they recommend that BLM analyze potential affects to these species in a biological evaluation.

***Response**: There are no special status species in the treatment sites. The EA has been revised as such and states that there are no special status species within the treatment sites and that any known populations are at least 1 mile from any treatment areas and are therefore not adjacent to or within any treatments.*

The commenter also suggested that the following conservation measures be implemented or carried forward in this project.

PL-1 known locations and potential habitat for special status plant populations will be mapped to facilitate planning.

***Response**: All known locations and populations have been identified and have already been mapped.*

PL-2, 3, 4 BLM will coordinate with FWS to delineate buffer areas around plant populations prior to prescribed fire and vegetation treatment activities. BLM will not stage equipment in habitat occupied by special status species

***Response**: Buffer areas are not needed as the plant species do not occur adjacent to any of the treatment areas and are at least a mile away from any treatment areas. No vehicular activity or personnel activity will take place in any of the areas of known plant populations. As stated previously all populations are at least a mile from any treatment sites.*

CC-2, 3 The commenter states that any presence of condors in the project area will be reported and recorded to the resource advisor and if condors arrive the birds will be avoided.

***Response**: As stated in the condor mitigation measures condors will be protected. CC2B. Where California condors visit a worksite while activities are underway, the on-site supervisor will notify the BLM wildlife team lead or condor biologist. Project workers and supervisors will be instructed to avoid interaction with condors. Project activities will be modified, relocated, or delayed if those activities may have adverse affects on condors. Operations will cease until the bird leaves on its own or until techniques are employed by permitted personnel which results in the individual condor leaving the area.*

CC-4 All camp areas will be kept free of trash

***Response**: There will be no camp areas.*

CC-5 Aircraft used near the Vermilion cliffs will be minimized.

***Response**: No aircraft use will take place within 9 miles of the condor release site. CC7B. Aircraft use, especially low level flights along the rim of the Vermilion Cliffs and flights near the condor release site at Vermilion Cliffs, will be minimized to the greatest extent possible in order to avoid disturbance to condors which may be present. Known active nest sites will be avoided.*

CC-8 Aircraft will remain a set distance from condors.

***Response**:* In relation to this comment the EA states in Condor mitigation measures. *CC10B. Aircraft will maintain and maximize safe flying separation distances from, in order to avoid, flying condors. Aircraft will also keep a minimum of 0.25 miles away from condors located on the ground". The EA condor mitigation measures have been revised to say "remain 400 meters from condors" and "unless safety concerns override this restriction".*

Finally, the commenter stated that in 2004 BLM issued an ROD for the LUP Amendment for Fire, Fuels and Air Quality Management and that language should be included as such.

***Response**: The language for this comment has been added to the EA to accommodate the suggested*

change.

RIGHTS OF APPEAL

This decision is effective immediately in accordance with regulations contained in 43 CFR 4190.1.

If an appeal is taken, your notice of appeal must be filed in this office (at the above address) within 30 days of the receipt of this decision. The appellant has a burden of showing that the decision appealed is in error.

If you wish to file a petition (request) pursuant to regulation 43 CFR 4.416 for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the board, the petition for a stay must accompany your notice of appeal . A petition for stay is required to show sufficient justification based on standards listed below. Copies of the notice to appeal and petition for stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the soliciter (see 43 CFR 4.416) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

(1) The relative harm to the parties if the stay is granted or denied,
(2) The likelihood of the appellant's success on the merits,
(3) The likelihood of immediate and irreparable harm if the stay is not granted,
(4) Whether the public interest favors granting the stay.

Approved by: _____ Date: _____
Acting Field Manager
Arizona Strip Field Office

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Arizona Strip Field Office
345 East Riverside Drive
St. George, Utah 84790
Phone (435)688-3200 • Fax (435)688-3258
www.az.blm.gov

In Reply Refer To:
5400(110)

July 30, 2005

NOTICE OF DECISION

Dear Interested Party:

Enclosed is a copy of the Decision Record, and revised EA-AZ-110-2005-0027 DR-AZ-110-2005-0027, for the sagebrush/tree fuels reduction treatment project on approximately 34,685 acres of public lands administered by the Arizona Strip Field Office approved by the BLM on July 30, 2005. Thank you for your comments on the environmental analysis. All comments received are addressed in the decision record.

In summary, the chemical treatments will be allowed in certain areas on the Arizona Strip in accordance with the mitigation and conditions noted in the Decision Record.

If you have any questions, please contact Ben Ott at (435) 688-3329.

Sincerely,

Becky Hammond
Field Manager

Enclosure: EA-AZ-110-2005-0027
DR-AZ-110-2005-0027